

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

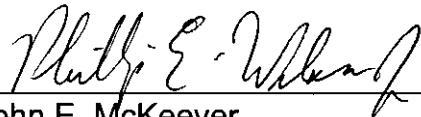
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

SECOND SET OF INTERROGATORIES FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS TOLLEY  
(UPS/USPS-T6-5 through 7)  
(January 31, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Tolley (UPS/USPS-T6-5 through 7).

Respectfully submitted,



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William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

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Of Counsel.

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TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY

UPS/USPS-T6-5. Refer to page 25 of your testimony, at lines 22-23, where you state that "Nonhousehold entities, primarily businesses are involved in the preponderance of First-Class Mail."

(a) Is it your testimony that most First Class letter mail volume is sent by business mailers?

(b) Is it your testimony that most First Class letter mail volume is delivered to business customers?

(c) Is it your testimony that most First Class letter mail volume is either delivered to or sent by business mailers?

(d) Provide for BY 1998 (i) the volume of First Class letter mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for BY 1998 (i) the volume of First Class letter mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If the information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for First Class letter mail the volume that was sent by businesses to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

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(g) Provide for First Class letter mail the volume that was sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(h) Provide for First Class letter mail the volume that was sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(i) Provide for First Class letter mail the volume that was sent by residential customers to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(j) Is it your testimony that most single piece First Class letter mail volume is sent by business mailers?

(k) Is it your testimony that most single piece First Class letter mail volume is delivered to business customers?

(l) Is it your testimony that most First Class letter mail volume is either delivered to or sent by business mailers?

(m) Provide for BY 1998 (i) the volume of single piece First Class letter mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(n) Provide for by 1998 (i) the volume of single piece First class letter mail that was sent to residential customers, and, separately, (ii) the volume that was

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sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(o) Provide for single piece First Class letter mail the volume that was sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(p) Provide for single piece First Class letter mail the volume that was sent by businesses to residential customers in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(q) Provide for single piece First Class letter mail the volume that was sent by residential customers to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(r) Provide for single piece First Class letter mail that was sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T6-6. Refer to page 71 of your testimony, at lines 21-23, where you state, "Private cards are used for short notices and greetings and are sent by households, respondents to firms that engage in business-reply advertising, utility companies and other firms."

(a) Is it your testimony that most single piece Private Card volume is sent by residential mailers?

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(b) Is it your testimony that most single piece Private Card volume is delivered to residential customers?

(c) Is it your testimony that most single piece Private Card volume is either delivered to or sent to residential mailers?

(d) Provide for BY 1998 (i) the volume of single piece Private Cards that were sent by residential customers, and, separately, (ii) the volume that were sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

(e) Provide for BY 1998 (i) the volume of single piece Private Cards that were sent to residential customers, and, separately, (ii) the volume that were sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide the volume of single piece Private Cards that were sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(g) Provide the volume of single piece Private Cards that were sent by businesses to residential customers in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(h) Provide the volume of single piece Private Cards that were sent by residential customers to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

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(i) Provide the volume of single piece Private Cards that were sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T6-7. (a) Provide for BY 1998 (i) the volume of First Class Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for BY 1998 (i) the volume of First Class Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide the volume of First Class Mail that was sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide the volume of First Class Mail that was sent by businesses to residential customers in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

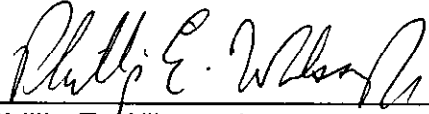
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(f) Provide the volume of First Class Mail that was sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in cursive script, reading "Phillip E. Wilson, Jr.", written over a horizontal line.

Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: January 31, 2000  
Philadelphia, Pa.